

FILED
Clerk
District Court

SEP 06 2005

For The Northern Mariana Islands
By _____
(Deputy Clerk)

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Attorney for Defendant

IN THE UNITED STATES DISTRICT COURT
FOR THE
NORTHERN MARIANA ISLANDS

) CIVIL ACTION No. 05- 0013
KENNETH C. COCHRANE, ERICA P.)
COCHRANE, and ACHALI K)
COCHRANE, a minor represented by)
KENNETH C. COCHRANE)
)
Plaintiffs) DEFENDANT'S DISCOVERY DISCLOSURES
)
v.) DATE : 9/7/05
) TIME : 8:30 Am
FRANCISCO W. BORJA) JUDGE : ALEX R. MUNSON
)
Defendant)

Comes now defendant Francisco Borja ("Borja") who submits the following pre-discovery disclosure:

A. PERSONS WITH DISCOVERABLE INFORMATION:

In addition to each of the parties, persons known to Borja with discoverable knowledge include but are not limited to the following:

1. Police Office John Sablan, Department of Public Safety
2. Jessica Wasisang, Koblerville, Saipan, 288-1286.

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3. Hoib Ngirachemoui, Pastor, Palau Evangelical Church, Navy Hill, Saipan

B. DESCRIPTION AND LOCATION OF RELEVANT DOCUMENTS:

The documents possessed by Borja relevant to his defenses in this lawsuit have been produced to plaintiffs in response to the production request of Kenneth Cochrane. Documentation relevant to the defense such as the existence of a power outage at the time of the collision should be in the possession of the Commonwealth Utilities Corporation. Documentation relevant to the defense in this case is also possessed by plaintiffs.

C. EXPERT WITNESSES:

Borja has not made a determination as to whether he will use an expert witness in this case.

D. COMPUTATION OF DAMAGES:

Borja is unaware of any specific damages, if any, actually suffered by plaintiffs.

Dated this 6th day of September, 2005.

Law Office of G. Anthony Long

By: 

G. Anthony Long